

GIBBONS P.C.

Robert K. Malone, Esq.
Kyle P. McEvilly, Esq.
One Gateway Center
Newark, New Jersey 07102-5310
Telephone: (973) 596-4500
Email: rmalone@gibbonslaw.com
kmcevilly@gibbonslaw.com

Co-Counsel for Johnson Health Tech Retail, Inc.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

BOWFLEX INC., *et al.*,

Debtors.¹

(Hon. Andrew B. Altenburg, Jr.)

Chapter 11

Case No. 24-12364 (ABA)

(Joint Administration Requested)

APPLICATION FOR ADMISSION OF CAROLINE DJANG, ESQ. PRO HAC VICE

**TO: HONORABLE ANDREW B. ALTENBURG, JR.
UNITED STATES BANKRUPTCY JUDGE**

Robert K. Malone, Esq., a member of the bar of this Court, hereby moves for the entry of an Order granting the admission *pro hac vice* of Caroline Djang, Esq. of Buchalter, A Professional Corporation (“Buchalter”), to practice before this Court in connection with the above-captioned cases. This application (the “Application”) is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Rules”). Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the undersigned represents as follows:

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: BowFlex Inc. (2667) and BowFlex New Jersey LLC (3679). The Debtors’ service address is 17750 S.E. 6th Way, Vancouver, Washington 98683.

1. I am an attorney at law of the State of New Jersey, admitted to practice in the United States District Court for the District of New Jersey, the United States Court of Appeals for the Third Circuit, the United States District Courts for the Southern and Eastern Districts of New York, and a director of the law firm Gibbons P.C., which maintains an address of One Gateway Center, Newark, New Jersey 07102-5310. Gibbons P.C. has been retained to serve as co-counsel, with Buchalter, for Johnson Health Tech Retail, Inc., in connection with the above-captioned cases.

2. I submit this Application, pursuant to Civil Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Local Rule 9010-1, in support of the entry of an Order granting the admission *pro hac vice* of Caroline Djang, Esq. to this Court.

3. Ms. Djang is an attorney at law and a partner at the law firm Buchalter, which maintains an office at 18400 Von Karman Avenue, Suite 800, Irvine, CA 92612-0514.

4. Attached hereto is the Certification of Ms. Djang in which she certifies that she is, and has been, a member in good standing of the bars of the State of California and the United States District Court for the Northern, Southern, Eastern and Central Districts of California since 2001. Additionally, Ms. Djang certifies that she is, and has remained, a member of good standing of said bars at all times, that no disciplinary proceedings are pending against her in any jurisdiction and no discipline has previously been imposed on her in any jurisdiction.

5. Ms. Djang is familiar with the circumstances surrounding the above-captioned proceedings and applicable law, and her presence will serve the best interests of Johnson Health Tech Retail, Inc.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Caroline Djang, Esq. to represent the Johnson Health Tech Retail, Inc. as co-counsel in the above-captioned cases.

Dated: March 5, 2024
Newark, New Jersey

GIBBONS P.C.

/s/ Robert K. Malone
Robert K. Malone, Esq.
Kyle P. McEvilly, Esq.
One Gateway Center
Newark, New Jersey 07102-5310
Telephone: (973) 596-4500
Email: rmalone@gibbonslaw.com
kmcevilly@gibbonslaw.com

Co-Counsel for Johnson Health Tech Retail, Inc.